

**U. S. Department of Justice**



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January 17, 2006

Honorable Thomas J. McAvoy  
Senior Judge, U.S. District Court NDNY  
Federal Building  
15 Henry Street  
Binghamton, New York 13901

**Re: United States v. David Falso, [05-CR-270 (TJM)]**

Dear Judge McAvoy:

This letter request respectfully seeks permission for the government to file an over the page limit Omnibus Motion Response to defendant Falso's extensive and voluminous omnibus motions. Our Omnibus Motion Response is 34 pages long. It was simply impossible to cover all the issues and grounds raised by defendant Falso in a shorter response.

Thank you for your consideration in this matter.

Very truly yours,

GLENN T. SUDDABY  
United States Attorney

A handwritten signature in black ink, appearing to read "Glenn T. Suddaby".  
BY: Miroslav Lovric  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE FOR ELECTRONIC CASE FILING SYSTEM**

I hereby certify that on January 17, 2006, I electronically filed with the NDNY Clerk of the District Court using the CM/ECF system the above-referenced document(s) in connection with the above-referenced case. The CM/ECF system automatically sent electronic notifications of such filing to the attorneys of record in this case, as maintained by the District Court Clerk's Office, AND who are properly registered in the CM/ECF system for the NDNY as required pursuant to NDNY General Order #22. As for any attorney of record in this case who is not registered in the CM/ECF system for the NDNY, the government has caused to be mailed or faxed to that attorney either the actual CM/ECF electronic notification/e-mail as received from the CM/ECF system by the government and/or the actual documents being filed. Therefore, the non-registered attorney(s) will receive the same electronic ECF notice with the same information as will the attorney(s) who is/are registered in the CM/ECF system.



Miroslav Lovric  
Miroslav Lovric  
Assistant U.S. Attorney